



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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November 2, 2011

BY ECF

Honorable James Orenstein  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Russ v. Derrell Chavers, et al., 10 CV 1370 (SLT)(JO)

Dear Magistrate Judge Orenstein:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department, and the attorney assigned to the above-referenced case on behalf of Detective Chavers. I write pursuant to Your Honor's Order issued at the October 19, 2011 status conference, which directed this office to notify the Court as to whether defendant Chavers kept any hand-written notes regarding the criminal investigation which underlies this case. As the undersigned stated at the October 19, 2011 conference, because defendant Chavers is a detective, he completed DD5 Reports instead of documenting his investigation in a memobook. However, at the undersigned's request, Detective Chavers retrieved the investigation file from storage to determine whether there were any handwritten notes of any kind in the file. Earlier today, Detective Chavers provided this office with several pages of notes written by the detectives involved in the investigation. Accordingly, this office is in the process of reviewing said notes, and will provide them to plaintiff once we have determined if there are any applicable privileges.

Thank you for your consideration in this regard.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Lisa M. Richardson", is written over the typed name.

Lisa M. Richardson  
Assistant Corporation Counsel  
Special Federal Litigation Division

cc: BY MAIL  
Jamal Russ  
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